

EXHIBIT “B”



July 9, 2021

VIA EMAIL (vowell@fsclaw.com)

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RE: *Kajeet, Inc. vs. McAfee Corp.*
U.S.D.C. District of Delaware, Case No. 21-cv-5-MN

Counsel:

We write in response to Mr. Vowell's July 7th letter. As you know, McAfee has made its source code available for inspection to Kajeet. Because Kajeet has not yet inspected that source code, we do not understand your letter to take issue with the completeness of that code. And as we have previously explained to you, we are not aware of any technical documents that better describe the accused aspects of Safe Family than the source code. Regardless, if after reviewing McAfee's source code, Kajeet believes there is an aspect of the accused feature that is not evident in the source code, please identify that aspect of the product with specificity and we will investigate.

To the extent Kajeet is asking that McAfee produce technical documents irrespective of McAfee's source code production, we understand that Kajeet made the same argument in the NortonLifeLock matter and filed a motion to compel with the court, which was denied. Thus, McAfee sees no obligation to supplement its production of core technical documents at this time.

Thank you.

Sincerely,

Aamir A. Kazi
AXK/sxr